

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MELINDA SGARIGLIA,)	
)	
Plaintiff,)	Case No. 1:19-cv-05684
v.)	
)	Honorable Robert M. Dow, Jr.
AMERICAN INTERNATIONAL)	
RELOCATION SOLUTIONS, LLC, d/b/a)	Magistrate Judge Gabriel A. Fuentes
AIRES, an Illinois limited liability)	
company, NICHOLAS GONRING, and)	Jury Demanded
KELSEY GONRING,)	
)	
Defendants.)	
<hr style="width: 45%; margin-left: 0;"/>		
NICHOLAS GONRING and KELSEY)	
GONRING,)	
)	
Third-Party Plaintiffs,)	
)	
v.)	
)	
2726 WEST CORTEZ CONDOMINIUM)	
and JOHN GORR,)	
)	
Third-Party Defendants.)	

AMENDED JOINT STATUS REPORT

Third-Party Plaintiffs, Nicholas and Kelsey Gonring (together, the “**Gonrings**”) and Third-Party Defendants, John Gorr (“**Gorr**”), 2726 West Cortez Condominium (the “**Association**”), Plaintiff Melinda Sgariglia, and Defendant American International Relocation Solutions, LLC (“Aires”), for their joint status report on Rule 56 discovery, filed pursuant to the Order dated September 29, 2022 (Dkt. #173), state as follows:

The Parties, through counsel, met via teleconference on October 3, 2022, at 4:00 p.m. Counsel present were as follows: Carol Oshana for Plaintiff, Arthur McColgan for Defendant Aires, Jordan Finfer for Defendants/Third-Party Plaintiffs the Gonrings, and David Eisenberg for

Third-Party Defendants Gorr and the Association.

A. Third-Party Plaintiffs' plans for Rule 56 discovery.

The Gonrings intend to issue interrogatories and requests for production of documents to Gorr and the Association. Based upon the Third-Party Defendants' responses to written discovery requests, the Gonrings may take the deposition of Gorr and/or the Association.

B. Third-Party Defendants' plans for Rule 56 discovery.

Gorr and the Association intend to issue interrogatories and requests for production of documents to the Gonrings. Based upon the Gonrings' responses to written discovery requests, Gorr and the Association may take depositions of the Gonrings.

C. Agreed time frame for completion of Rule 56 discovery.

The parties agree that discovery can be completed as follows:

1. Written discovery requests to be issued on or before October 6, 2022;
2. Responses to written discovery to be served on or before November 7, 2022; and
3. Fact depositions to be completed on or before November 30, 2022.

D. Plaintiff time frame for Discovery

Plaintiff proposes completing Defendant depositions by November 30, 2022 and filing her Motion for Summary Judgment by January 31, 2022.

Defendants Gonrings do not agree with Plaintiff's proposed schedule to complete her discovery. Per docket entry 113, fact and expert discovery in Plaintiff's case in chief closed on May 6, 2022. No requests for extensions have been filed other than to extend Third-Party discovery.

E. Aires position on Parties' proposed discovery schedules

Aires has no objection to Plaintiff's, Third-Party Plaintiffs', or Third-Party Defendants'

proposed discovery schedules. Should the Court allow Plaintiff to take oral discovery, Aires requests that it likewise be given until November 30, 2022 to complete the deposition of any witnesses.

Dated: Oct 5, 2022

Respectfully submitted,

/s/ Elizabeth L. Archerd

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